

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:)	
)	
Amoco Chemical Company)	FINDING OF VIOLATION
Joliet Plant)	
Channahon, Illinois)	EPA-5-99-IL-3
)	
)	
Proceedings Pursuant to)	
Section 113 (a)(3) of the)	
Clean Air Act,)	
42 U.S.C. § 7413(a)(3))	

FINDING OF VIOLATION

The United States Environmental Protection Agency ("U.S. EPA"), by authority duly delegated to the undersigned, hereby notifies the State of Illinois and Amoco Chemical Company that U.S. EPA finds, pursuant to Section 113(a)(3) of the Clean Air Act ("Act"), 42 U.S.C. § 7413(a)(3), that Amoco's Joliet Plant, located at 23425 Amoco Road in Channahon, Illinois, is in violation of Section 112 of the Act, 42 U.S.C. § 7412, and regulations promulgated thereunder setting forth National Emission Standards for Hazardous Air Pollutants ("NESHAPS") for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry ("HON"). These regulations are set forth at 40 C.F.R. Part 63, Subparts F-I. Specifically, Amoco's Joliet Plant is in violation of the HON as follows:

1. Amoco has operated a process vent in their isophthalic acid unit in violation of 40 C.F.R. § 63.113(a). The process vent identified as HT-504/HF-505 in the notification of compliance status ("NCS") submitted on September 17, 1997, has operated since April 22, 1997 without maintaining a Total Resource Effectiveness ("TRE") index value, as defined in 40 C.F.R. § 63.111, of greater than 1.0 as required by 40 C.F.R. § 63.113(a)(3). Also, this process vent has failed to comply with either 40 C.F.R. § 63.113(a)(1) or (2) as alternate compliance options.
2. The NCS indicated that the TRE index value was 1.02. U.S. EPA has determined this to be based on an incorrect calculation. The actual TRE index value is below 1.0 as explained in paragraph 5, below.

3. Process vents with calculated TRE index values below 1.0 are Group 1 process vents as defined in 40 C.F.R. § 63.111.

4. Group 1 process vents require control as specified in 40 C.F.R. § 63.113(a). Amoco did not control the process vent using one of the options at 40 C.F.R. § 63.113(a)(1)-(3). Failure to comply with the reference control technology provisions of this paragraph is a violation of section 112 of the Act.

5. 40 C.F.R. § 63.103(b)(3) requires that performance tests be conducted at maximum representative operating conditions. Two tests were averaged to produce the TRE index value of 1.02 reported in the NCS. Only one of these test can be claimed as "maximum representative conditions", and based on that test the TRE index value was calculated to be 0.91. Amoco failed to conduct the performance test used to determine the TRE at "maximum representative operating conditions" as required by 40 C.F.R. § 63.103(b)(3). Failure to comply with the provisions of this paragraph is a violation of section 112 of the Act.

6. 40 C.F.R. § 63.152(b)(2) states that "[f]or each monitored parameter for which a range is required to be established...the Notification of Compliance Status shall include...(ii) The rationale for the specific range for each parameter for each emission point, including any data and calculations". Amoco is in violation of 40 C.F.R. § 63.152(b)(2)(ii) as their NCS does not contain this information. Amoco's performance tests were conducted within a temperature range of 88-92 degrees Fahrenheit, while the monitoring range was identified as 80-110 degrees Fahrenheit. No rationale for this temperature range was provided. Failure to comply with the provisions of this paragraph is a violation of section 112 of the Act.

1/7/99
Date



Stephen Rothblatt, Acting Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Betty Williams, do hereby certify that a Finding of Violation was sent by Certified Mail, Return Receipt Requested, to:

Gregory P. Chodil
Environmental Supervisor
Amoco Chemical Company
Joliet Plant
P.O. Box 941
Joliet, Illinois 60434-0941

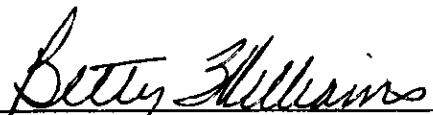
I also certify that copies of the Finding of Violation were sent by first class mail to:

David Kolaz, Chief
Bureau of Air
Compliance and Systems Management Section
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62702

and

Mel Villalobos, Regional Manager
Region I
Illinois Environmental Protection Agency
Chicago Regional Office
1701 First Avenue - Suite 600
Maywood, Illinois 60153

on the 7th day of January, 1999.


Betty Williams, Secretary
AECAS, (IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: P140 894/283